

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KAJEET, INC.,

Plaintiff,

v.

GRYPHON ONLINE SAFETY, INC.,

Defendant.

C.A. No. 19-CV-02370-MN

**GRYPHON ONLINE SAFETY, INC.’S MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(b)(6)**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendant Gryphon Online Safety, Inc. (“Gryphon”) moves for an Order, substantially similar to the proposed order attached hereto, dismissing Plaintiff Kajeet, Inc.’s claims against Gryphon for infringement of U.S. Patent Nos. 8,667,559 and 7,899,438 in its Complaint, with prejudice, because the claims of the asserted patents are unpatentable under 35 U.S.C. § 101, and because the Complaint fails to state a plausible claim upon which relief can be granted on multiple bases. The grounds for this motion are set forth in Gryphon’s Opening Brief filed herewith.

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Dated: May 8, 2020